

Torres, Francine

From: info@watershedmedia.org%inter2 [info@watershedmedia.org] on behalf of info@watershedmedia.org
Sent: Tuesday, February 22, 2005 3:30 PM
To: Torres, Francine
Cc: wildfarms@earthlink.net%inter2
Subject: Letter of Support for Wild Farm Alliance's biodiversity conservation criteria
Attachments: ATTACHMENT.TXT

To: Jim Riddle, Chair of NOSB
c/o Ms. Francine Torres
USDA-AMS-TMD-NOP
1400 Independence Avenue, SW
Room 4008-So.
Ag Stop 0268
Washington, DC 20250-0200

From: Dan Imhoff
451 Hudson Street
Healdsburg, California 95448

Date: February 21, 2005

Re: Support of the Addition of the Wild Farm Alliance "Biodiversity Conservation Criteria" with the NOSB's model Organic System Plan (OSP)

Dear Mr. Riddle,

Greetings. As a writer, former eco-clothing researcher, and small-scale farmer, I have been following the evolution of organic farming movement and standards for many years. By the late 1990s it became apparent to me (and many others) that a deep appreciation and concern for agriculture's impacts on biodiversity seemed to be absent from many discussions about "sustainable" agriculture—even among successful organic farmers. That realization led me on a multi-year journey that has included the writing and publishing of a widely acclaimed book, *Farming with the Wild: Enhancing Biodiversity on Farms and Ranches* (2003), as well as the co-founding of a dynamic organization focused on the conservation-based agriculture movement, The Wild Farm Alliance.

As the current president of the Wild Farm Alliance, I have been closely following our organization's leading efforts to work with organic certification organizations to include biodiversity conservation criteria as part of their standards. Indeed, Wild Farm Alliance researchers and others have shown that the National Organic Program rule already includes a requirement for biodiversity conservation which has not yet been addressed. Given the massive scope of the NOSB effort, this is completely understandable. It is also the reason why the Wild Farm Alliance has worked closely with a coalition of organic farmers and inspectors, conservationists, and others to develop criteria to generate a commonly understood

concept of what it means to maintain biodiversity, and how to maintain or improve the natural resources on a given farm or ranch.

My work on both *Farming with the Wild* and the Wild Farm Alliance has given me the opportunity to speak to numerous groups of organic producers around the country, many of whom are extremely interested in the issue of biodiversity protection. For that reason I am writing to ask you to add the Wild Farm Alliance's biodiversity conservation criteria to the NOSB's model Organic System Plan (OSP). There are a number of compelling reasons to do so. 1) This will help to address the requirement of biodiversity conservation already in the Organic Program Rule. 2) Such an endorsement would help certifiers to establish a common expectation of what biodiversity conservation should strive for within an organic production system. 3) These criteria would not require any further rewriting of your existing rule. 4) These criteria are easily applied to any farm size or situation. 5) These criteria were the consensus of many hours of work among a broad-based coalition outlined above.

As a farmer, I believe that the biodiversity additions proposed by the Wild Farm Alliance are reasonable and easily applied by farmers. In fact, I see more farmers all the time, trying to find ways to incorporate them into their farming practices and land stewardship. As a conservationist, I am soundly convinced that the fate of much of our biodiversity will be directly linked to the efforts of farmers, ranches, forest owners, and others to maintain or restore wild areas within our rural landscapes. Clearly, the organic eco-label, with its ever-increasing reputation for exemplary stewardship, is the ideal organization to take the lead on this issue. Doing so will bring many benefits to farmers and society in general, not the least of which is a new vision for sustainable agriculture, one in which economically and ecologically viable farms and ranches are seamlessly integrated within healthy landscapes that strive to maintain the fullest range of native species possible. Adopting the Wild Farm Alliance biodiversity criteria is a small but significant step toward that goal.

I thank you for your careful consideration of this letter, and look forward to your decision.

Yours,

Dan Imhoff
President, Watershed Media
President, Wild Farm Alliance